

Dear Ms. Saare-Edmonds,

Although I haven't had much time to look at the proposed MWELD in any detail yet because I've just recently been made aware of it, I do have concerns about some of the proposed language. As a Landscape Architect who has been practicing in San Diego for over 30 years, I've seen other droughts on California and I've seen how the landscape industry has responded to those droughts. I sincerely believe the landscape industry has taken a leadership role over the years to help reduce the amount of water applied to landscaped areas. I fully support Governor Brown's mandate for us all to reduce our water use by 25% and believe we can achieve that goal by being responsible stewards of our natural resources.

Please do not change the language in sections:

491 (q) - The proposed ET adjustment factors are unreasonably restrictive. A tremendous amount of work has been done over the years to determine the ET adjustment factor for various plant species, namely WUCOLS. To arbitrarily reduce the ET adjustment factor in an attempt to reduce the amount of watering seems counterproductive. Using factors such as this will only end up wasting water by allowing so little to be applied it won't be effective in maintaining plant health. Let the landscape professionals make the right choice in plant material for new landscapes. Let us rely on well researched information such as WUCOLS to determine water needs.

491 (bb) – In past years, we thought achieving an irrigation efficiency of 0.65 was really accomplishing something. Over time irrigation equipment has gotten better and irrigation design has improved. However, there are many factors involved in irrigation efficiency and achieving an efficiency of 0.8 and 0.92 will be impossible to meet. These also seem to be arbitrary numbers.

492.7 (M) – Limiting precipitation rates to 1" per hour also seems to be arbitrary and not based on real world factors. While lower precipitation rate irrigation heads are preferred by most landscape professionals, they can pose somewhat of a problem of larger sites where the water window is reduced or watering times are mandated. Lower precipitation rate heads are mostly used to control runoff and to ensure the water soaks into the soil to the plant roots where it is intended to go. Low precipitation rates simply means longer run times. The difference between an irrigation head with a 40' radius at 1" per hour vs. the same head at 1.5" per hour is very small. In situations such as golf course greens with a sandy soil, it is necessary to use a higher precipitation head to get the water down in a shorter period of time.

492.13 – Irrigation Efficiency. Same as above. These numbers seem unachievable except in perfect, controlled conditions.

I wish I had more time to review this document in greater detail. Being a resident of San Diego, we don't have to worry about this Ordinance because the City has adopted its own water restriction ordinance, which by the way uses the same approach, mandate things that don't make sense from a horticultural perspective. The City of San Diego wants to limit watering to two days a week for five minutes. All we will be doing is wasting water while our turf and trees die. There is no science behind that mandate and I feel there is no science behind the proposed changes to the MWELO.

Thank you.

Jim Winter